

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**DOCKET NO. 2020-125-E**

Application of Dominion Energy South	)	<b><u>UNITED STATES DEPARTMENT</u></b>
Carolina, Inc. for Adjustment of	)	<b><u>OF DEFENSE AND ALL OTHER</u></b>
Rates and Charges (See Commission	)	<b><u>FEDERAL EXECUTIVE</u></b>
Order No. 2020-13)	)	<b><u>AGENCIES' EIGHTH SET OF</u></b>
	)	<b><u>WRITTEN INTERROGATORIES</u></b>
	)	<b><u>AND REQUEST FOR</u></b>
	)	<b><u>PRODUCTION OF DOCUMENTS</u></b>
	)	<b><u>AND THINGS TO DOMINION</u></b>
	)	<b><u>ENERGY SOUTH CAROLINA, INC.</u></b>

Pursuant to the Public Service Commission's Regulation 103-833, the United States Department of Defense and all other Federal Executive Agencies ("DoD/FEA"), by and through its legal counsel, hereby submits its Eighth Set of Written Interrogatories and Request for Production of Documents and Things to Dominion Energy South Carolina, Inc.

**INSTRUCTIONS**

1. Responses to these request should be provided within 20 days of this request in writing and under oath.
2. These Requests are continuing in nature and require supplemental answers within a reasonable time if additional documents or information would be responsive to these Requests.

3. If any of the responses do not contain complete information, so state this and identify each person who may have the additional information.

4. Due to mandated teleworking due to COVID-19, please deliver responses electronically to [emilcy.w.medlyn.civ@mail.mil](mailto:emilcy.w.medlyn.civ@mail.mil).

### **DEFINITIONS**

1. “Company” is defined as Dominion Energy South Carolina, Inc.

2. “DESC” is defined as Dominion Energy South Carolina, Inc.

3. “DESS” is defined as Dominion Energy Southeast Services, Inc.

4. “DE” is defined as Dominion Energy

5. “Document” and “workpaper” shall have the broadest possible meaning and include, without limitation, the original and any non-identical copy (whether different from the original because of handwritten notes, underlining, or other marks,) regardless of origin or location, of written, typed, printed, or graphic matter (however produced or reproduced), and electrical or magnetic sound or video recordings, or transcriptions thereof, file or photographic prints, and all other writings or recordings of every kind and description, including, but not limited to, papers, letters, correspondence, agreements, contracts, telegrams, notes, notations, computer printouts, digital or e-mail communications, text messaging, data sheets, data processing cards or tapes, memoranda (including memoranda or memorials of conversations or meetings), intra-office communications, notebooks, reports, articles, books, pamphlets, periodicals, tables, charts, graphs, blueprints, drawings, studies, worksheets, estimating sheets, bids, bills, time cards, indices, lists, surveys, diaries, diary entries, facsimiles, specimens, models, schedules, accounts, invoices, purchase orders, estimates, ledgers, audits, and indices, and drafts, revisions or amendments of any

of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

6. “Identify” or “identity,” when referring to a natural person, shall mean to provide without limitation his or her full name, present or last-known address, telephone number, present or last-known business affiliation and location, and job titles and responsibilities during the applicable time covered by any response referring to such person.

7. “Identify” or “identity,” when referring to a document or writing, shall mean to give sufficient characterization of the document or writing so as to have identified it with reasonable particularity and shall include, without limitation, the following information with respect to such document or writing:

- a. The author and the sender of the document or writing;
- b. The date appearing on the document or writing, and if it has no date, the answer shall so state but shall give the date or approximate date the document or writing was prepared;
- c. The general nature or description of the document;
- d. The name of the person or persons, if any, to whom such document or writing was addressed and the names of other persons to whom the document or copies thereof were given or sent, if any;
- e. The name and address of the person having present possession, custody, or control of the document or writing.

## **DOCUMENT AND INFORMATION REQUESTS**

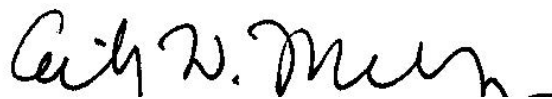
**DOD/FEA-DESC No. 8-1.** With respect to Mr. Kochems' rebuttal testimony concerning cash working capital, please provide the following additional information:

- a. Is Dominion Energy, Inc. allowed to use a 1/8th method to calculate its cash working capital allowance in any other jurisdiction in which it operates a regulated utility? If so, please describe the utility that uses the 1/8th method and the jurisdiction in which it is allowed.
- b. For each of Dominion Energy Inc.'s regulated utilities, please (1) provide the jurisdiction(s) in which it operates and (2) the method used for calculating each utility's cash working capital allowance in each jurisdiction in the utility's most recent rate case application.
- c. For each of Dominion Energy Inc.'s regulated utilities that uses a lead-lag study to calculate its cash working capital allowance, please provide a copy of the top sheet of the lead-lag study showing the cash working capital allowance requested in rates in the utility's most recent rate case.
- d. For each of Dominion Energy, Inc.'s regulated utilities that uses a lead-lag study to calculate its cash working capital allowance, please provide the rate case cost paid in the utility's most recent rate case to any outside consultant who helped the utility prepare the lead-lag study used in the rate case.

**DOD/FEA-DESC No. 8-2.** With respect to Alison Nawrocki's rebuttal testimony concerning EDIT, please provide the following information:

- a. Please provide the total amount of plant-related EDIT at the end of the test year and at the end of September 30, 2020. Please provide these amounts grossed-up for taxes as well.
- b. Please provide the total amount of protected plant-related EDIT at the end of the test year and at the end of September 30, 2020. Please provide these amounts grossed-up for taxes as well.
- c. Please provide the total amount of unprotected plant-related EDIT at the end of the test year and at the end of September 30, 2020. Please provide these amounts grossed-up for taxes as well.
- d. If the unprotected plant-related EDIT were amortized over a 5-year period, what would that annual amortization be?

Respectfully submitted,

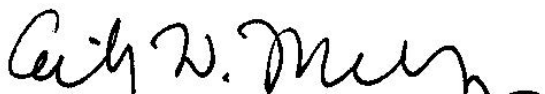


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December 10, 2020

**CERTIFICATE OF SERVICE**

I, Emily W. Medlyn, hereby certify that the foregoing document was served on all persons at the addresses listed in the Official Service List for Docket 2020-125-E on December 10, 2020.



Emily W. Medlyn